

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143

Honorable T.S. Ellis, III

Trial: October 19, 2021

MOTION TO SEAL DEFENDANT’S MEMORANDUM

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting the entirety of his Memorandum in Support of his Motion for Leave to File Response, Request for Appointment of Independent Expert to Conduct Independent Evaluation and Determine Whether Dr. Montalbano’s Methodology Comports with Accepted Psychological Practice, and for Oral Argument be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of September 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress